

## Robert Mancini

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June 8, 2016

New Jersey Department of Environmental Protection Bureau of Case Management Mail Code 401-05F P.O. Box 420 Trenton, NJ 08625-1455

Attn

Anne Pavelka, PG, CHMM

Case Manager

Re:

Southern Parcel of the North Field Extension (NFE) Ecological Evaluation

Chevron USA, Inc.

Perth Amboy, Middlesex County, New Jersey

SRP PI# 003621 RPC000005

Dear Ms. Pavelka:

I am responding to your April 28, 2016 letter, which was written in response to Chevron's letter of March 2, 2016.

Several points were raised in your letter: (1) the NJDEP indicates that metals are present throughout the Southern Parcel above the ecological screening criteria (ESC), with copper having the highest hazard quotient; (2) the NJDEP takes issue with the dataset used to determine background for comparison purposes; and (3) calls on Chevron to investigate migration of contamination from the Northern Parcels to Woodbridge Creek and/or the Southern Parcel.

As we have explained before, Chevron never conducted operations on the Southern Parcel, or for that matter any part of the North Field Extension. The constituents identified on the Southern Parcel are at relatively low levels given the surrounding conditions. Based on the dispersion of constituents, the known flooding of this property via inundation from Woodbridge Creek and the absence of industrial operations on the Southern Parcel, it is clear the source of any contamination is from off-site and there is no basis to require the owner of the Southern Parcel (Chevron) to perform any investigation or remediation. There is no basis to believe that Chevron is the source of any constituents on the Southern Parcel, or on the North Field Extension generally.

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Based on the above, Chevron sees no basis for the Department to request that Chevron retain an LSRP to delineate the contaminants detected on the Southern Parcel and respectfully requests that the NJDEP reconsider this request.

Sincerely,

Robert Mancini

Cc: Sin-Kie Tjho, EPA

Robert Lavorerio, CEMC

Neil Fletcher, Esq. Kenneth Siet, TRC

Maurice Migliarino, NJDEP